

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RAYMOND P. BIELATA,)	
Plaintiff)	
)	Civil Action No. 05-183 ERIE
v.)	
)	
CRIME VICTIM CENTER OF ERIE COUNTY,)	
INC., and SUSANNE POROWSKI)	
Defendants)	ELECTRONICALLY FILED

**STIPULATION FOR EXTENSION OF TIME TO
RESPOND TO COMPLAINT**

Plaintiff RAYMOND P. BIELATA, by and through his attorneys, McClure & Miller, LLP, and defendants CRIME VICTIM CENTER OF ERIE COUNTY, INC. AND SUSANNE POROWSKI, by and through their attorneys, MacDonald Illig Jones & Britton LLP, file this Stipulation for Extension of Time to Respond to Complaint pursuant to LR 7.2 of the Local Rules of United States District Court for the Western District of Pennsylvania, hereby stipulating and agreeing as follows:

1. Plaintiff Raymond Bielata commenced this lawsuit on or about June 13, 2005 by filing a Summons and Complaint in the United States District Court for the Western District of Pennsylvania at Civil Action No. 05-183 Erie.
2. The Complaint was forwarded to defendants Crime Victim Center of Erie County, Inc. and Susanne Porowski with a Request for Waiver of Service of Summons on or about June 24, 2005.

3. The Waiver of Service of Summons was signed and returned to plaintiff's counsel on or about July 11, 2005.

4. An Answer or Motion to plaintiff's Complaint is therefore due on or about August 23, 2005.

5. Counsel for plaintiff Bielata has agreed to extend the time for the filing of defendants' Answer or Motion to the Complaint by 45 days.

6. Pursuant to LR 7.2 of the Local Rules of the United States District Court for the Western District of Pennsylvania, counsel may file a stipulation once, without approval of court, extending the due date for the filing of an Answer or Motion for a period not exceeding 45 days from the due date.

7. Defendants Crime Victim Center of Erie County, Inc. and Susanne Porowski will now file an Answer or Motion to plaintiff's Complaint on or before October 7, 2005, 45 days from the original due date.

Respectfully submitted,

/s/ Jeffrey J. Cole
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Attorneys for Plaintiff,
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Attorneys for Defendants,
Crime Victim Center of Erie County, Inc. and
Susanne Porowski

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Stipulation for Extension of Time to Respond to Complaint was served upon the following counsel and unrepresented parties, via First-Class United States Mail, this 22nd day of August, 2005:

Jeffrey J. Cole, Esq.
McClure & Miller, LLP
717 State Street
Erie, PA 16501

Attorney for Plaintiff,
Raymond P. Bielata

/s/ Lisa Smith Presta

Lisa Smith Presta, Esq.